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CLERK OF SUPERIOR COURT

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF COCHISE

STATE OF ARIZONA,	)	Case No. CR201800385
	)	
Plaintiff,	)	JUDGE WALLACE R. HOGGATT
	)	DIVISION THREE
vs.	)	
	)	
LUIS LAURO SIQUEIROS-MEDINA,	)	REPLY IN SUPPORT OF STATE'S
	)	MOTION FOR ENTRY OF
Defendant.	)	PROTECTIVE ORDER

COMES NOW the State of Arizona, through the Cochise County Attorney, BRIAN M. McINTYRE, and SARA V. RANSOM, his Deputy, hereby submits its reply in support of entry of the Protective Order submitted to the Court with the State's Motion pursuant to Arizona Rules of Criminal Procedure 15.4 and 15.5.

Defendant's response contains inaccurate statements regarding communications between counsel as well as regarding the Protective Order itself, and its suggested alternative presents a far more onerous and unworkable approach to discovery in this matter. The State's proposed Protective Order has been entered in numerous other

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1 matters locally,<sup>1</sup> particularly sex cases which present heightened privacy concerns for the  
2 benefit of both the victim and Defendant, and is appropriate in light of the facts and  
3 circumstances of this case.

4 The proposed Protective Order submitted by the State complies with Arizona rules  
5 and does not impose any undue burdens upon the Defendant. The "Agreement to be  
6 Bound" is similar to agreements that defense counsel in this County already employ with  
7 experts and other third parties, so the "parade of horrors" hypothesized by Defendant  
8 are red herrings. Defendant's claims of due process and confrontation clause violations  
9 are inapplicable since the Protective Order is aimed at *facilitating* Defendant's pre-trial  
10 access to materials he may need to support his defense. Because it actually expedites  
11 disclosures, the Protective Order supports Defendant's due process and confrontation  
12 rights, it does not erect any barriers to them. Indeed, Defendant has suggested a  
13 competing form of Protective Order, thus implicitly acknowledging that such orders do  
14 not run afoul of Defendant's constitutional rights.

15 Under substantially similar circumstances, Courts in Arizona have entered  
16 Protective Orders with provisions like those contained within the State's proposed  
17 Protective Order. *See, e.g., Cervantes v. Cates*, 206 Ariz. 178, 185, 76 P.3d 449, 456 (Ct.

18  
19 <sup>1</sup> Defendant's claim that the State has run afoul of Arizona Supreme Court Rule 111(c)  
20 by noting to this court that other substantially similar or identical orders have been  
21 entered locally is in error. The State does not cite these orders to assert any precedential  
22 or binding effect, but instead alerts the Court to ensure it is aware of the prevalence of  
23 these orders and the risk of inconsistent rulings, particularly as Defendant is raising the  
24 same exact arguments that were rejected by Judge Conlogue in *State v. Chasse*,  
25 CR201800466. This form of order was entered via stipulation of counsel in at least the  
following Cochise County criminal matters: *State v. Mendez*, CR201600361 (luring),  
*State v. Savage*, CR201700100 (sex with minor); *State v. Leizza Adams*, CR201700425  
(child abuse--sex), *State v. Leon*, CR201700655 (rape). A similar form of order was also  
entered over objection of defense counsel by this Court in *State v. Steel*, CR201600843  
(murder).

1 App. 2003)<sup>2</sup> (“if there is any concern about disposition of the materials provided, a  
2 protective order limiting disclosure to counsel, prohibiting any further copying, and  
3 requiring defense counsel's agents to use the materials solely for the case and to return  
4 them to the State should be sufficient.”). The State’s proposed Protective Order is  
5 warranted by the circumstances of this matter, authorized by the Arizona Rules of  
6 Criminal and Civil Procedure, and affirmed by Arizona case law. It should be entered.

7 **A. Defendant Misleads The Court Regarding Counsels’ Communications and**  
8 **Disclosure by the State to Date.**

9 Defendant’s own attachments reveal that Defendant asked the State to delay filing  
10 its Motion. *See* Defendant’s Response at Appendix 4 (wherein counsel for Defendant  
11 asks the State on June 11 to avoid filing a motion for protective order until such time as  
12 the parties could have a hearing in July.) When defense counsel was ‘ready,’ the State  
13 noted that it was awaiting a ruling from Judge Conlogue on a form of protective order  
14 offered by the State in a separately-pending, yet similar matter. Counsel for Defendant  
15 agreed that the State’s decision to await Judge Conlogue’s decision before proceeding in  
16 this matter on a similar protective order “makes sense.” *See* July 6, 2018 email from X.  
17 Orozco to S. Ransom, attached as **Exhibit 1**. The State filed its Motion in this case  
18 within a few days of receipt of the order from Judge Conlogue, which entered a slightly  
19 modified version of the State’s proposed Protective Order. The version of Protective  
20 Order evaluated and entered by Judge Conlogue is now pending before this Court for its  
21 consideration.

22 Despite her agreement to the delays, counsel for Defendant now complains to the  
23 Court that the State was dilatory in filing its Motion. Counsel is the one who requested

24 <sup>2</sup> *Cervantes v. Cates*, 206 Ariz. 178, 185, 76 P.3d 449, 456 (Ct. App. 2003), *superseded*  
25 *on other grounds by* Ariz. R. Crim. P. 15(1)(j) as stated in *State ex rel. Montgomery v.*  
*Padilla*, 2017 WL 4784603, at \*2 (Ariz. Ct. App. Oct. 24, 2017), *review denied* (May 8,  
2018)

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1 and assented to the delays, and cannot now benefit from an alleged discovery issue that  
2 counsel invited. *Accord State v. Logan*, 200 Ariz. 564, 565–66, 30 P.3d 631, 632–33  
3 (2001) (“as we repeatedly have held, we will not find reversible error when the party  
4 complaining of it invited the error.”).

5 Defendant also claims that the State is withholding documents that are not  
6 confidential or private in nature. Specifically, Defendant’s counsel claims that “519  
7 photos, 3 digital images, or 10 audio files” and 2 video, all of which are contained on  
8 State’s Disclosure Disk #65, are not confidential but are being improperly withheld by  
9 the State. It is unclear how defendant’s counsel can be so certain that this information is  
10 not confidential if she has not seen it. Regardless, rather than speaking with counsel for  
11 the State to arrange for further analysis and copying of discoverable portions of the disk,  
12 Defendant asserted this “gotcha” claim of withholding non-confidential information in  
13 this Response and a contemporaneously-filed motion for release. Frankly, the State did  
14 not even know that Defendant’s counsel had not already obtained this information—  
15 which was identified in the State’s First Supplemental Disclosure Statement and made  
16 available on **June 8, 2018**—until reading the Response.

17 The State agrees that certain of the 519 photos, most of which were taken during  
18 the course of a search warrant, all 3 of the digital images, and certain of the 10 audio, are  
19 discoverable. As noted, those items have been available to Defendant since the State  
20 disclosed them in early June. The items were all put on the same disk as the forensic  
21 interviews, however, so the disk was noted as containing confidential information in the  
22 State’s disclosure. Had counsel for Defendant simply noted to counsel for the State that  
23 she believed some items on Disk 65 were not confidential and she wished to have staff  
24 come and copy those items, she would have had them months ago. Instead, she remained  
25 silent and now attempts to use this issue to gain leverage before the Court.



1           **B. Good Cause Exists to Enter the State's Proposed Protective Order.**

2           There does not seem to be a dispute that certain of the information in this case,  
3 such as the forensic interviews and images depicting or documents discussing the minor  
4 victims, are confidential. Where, as here, the State wishes to restrict disclosure, it may  
5 apply for a protective order. *See, e.g., Arizona Rules of Criminal Procedure 15.5.*  
6 Indeed, "[t]he rules recognize that the prosecutor's disclosure obligations may be  
7 qualified by court order under Rule 15.5 or by Rule 39(b), which concerns victims'  
8 rights. *See Ariz. R. Crim. P. 15.1(a), (b).* Under Rule 15.5(b), the court may authorize a  
9 party to excise extraneous information from a document that contains information subject  
10 to disclosure." *State ex rel. Montgomery v. Chavez ex rel. Cty. of Maricopa*, 234 Ariz.  
11 255, 256, 321 P.3d 420, 421 (2014). Additionally, "Rule 39(b) requires courts to  
12 construe the rules 'to preserve and protect a victim's rights to justice and due process,'  
13 and then specifies various rights that victims 'shall have and be entitled to assert.'" *Id.* at  
14 256, ¶ 8, 321 P.3d at 421.

15           With these principles in mind, the Court has broad discretion to regulate  
16 disclosure. *State v. McMurtrey*, 136 Ariz. 93, 97, 664 P.2d 637, 641 (1983) (citing  
17 additional authorities); *Ariz. R. Crim. P. 15.5(a)*, cmt. ("[t]he court is given broad  
18 discretion to limit discovery required by this rule whenever it is shown a risk of harm  
19 resulting from a specific disclosure"). Upon the moving party's showing of "good cause"  
20 for the protective order, the Court may "deny or regulate disclosures when it finds: (1)  
21 That the disclosure would result in a risk of harm outweighing any usefulness of the  
22 disclosure to any party; and, (2) That the risk cannot be eliminated by a less substantial  
23 restriction of discovery rights." *Cervantes*, 206 Ariz. at 182, 76 P.3d at 453 (emphasis  
24 supplied in original); *see also State ex rel. Montgomery*, 234 Ariz. at 256, 321 P.3d at 421  
25 ("The court, upon the motion of any party showing good cause, may also limit or prevent

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1 disclosure of required information if the risk of harm outweighs the usefulness of the  
2 disclosure and the risk cannot otherwise be eliminated.”). As further detailed herein, the  
3 State’s Motion and the proposed Protective Order satisfy these requirements.

4 1. The State seeks the Protective Order to Guard Against Numerous Harms.

5 When making the two-part determination, the Court may find that “good cause”  
6 exists to restrict, deny or allow redactions of disclosures where it finds there is, for  
7 example, “potential for harm to a witness or a party or interference with or disruption of  
8 ongoing police investigations.” *Id.* Here, the State’s Motion identified several grounds  
9 for seeking the protective order, including: (1) privacy rights and potential intimidation of  
10 the victim in this case, a young boy who was sexually victimized, (2) the early and on-  
11 going nature of the State’s investigation, which can be tainted by press or social media,  
12 (3) the fact that neither party has had a full opportunity to review all the information in  
13 the case because the electronic devices found in Defendant’s home are not in a readable  
14 format at this time, and (4) the fact that Rule 15.4(d) applies to officers of the court, not  
15 the Defendant, third parties or others that could use the information for purposes beyond  
16 the restrictions of the Rules. *See* State’s Motion, p. 2 and fn. 1.

17 The proposed Protective Order does not restrict access to the information pertinent  
18 to the State’s case and Defendant’s potential defenses. To the contrary, it establishes a  
19 procedure to ensure expedited access to information in exchange for confirmation that  
20 Defendant’s attorney will do what she has represented to be her intent—ensure that the  
21 information is used only for the development of the defense in this case. As noted in its  
22 Motion (at p. 2), the State does not question defense counsel’s commitment to the  
23 limitation imposed upon her as an officer of the Court, but is concerned based upon  
24 personal experiences with counsel for Defendant regarding what she understands to be  
25 appropriate use of the information, and is further concerned what may transpire if

1 Defendant and those who may support Defendant attempt to disseminate and  
2 sensationalize the information. The use of the information may intimidate witnesses, thus  
3 interfering with the State's ability to locate and fully investigate all evidence related to  
4 the charges alleged, and that may be alleged, against this Defendant. Indeed, the victim's  
5 mother is an undocumented immigrant, which has already resulted in issues for the State  
6 in securing on-going cooperation.

7 Where, as is the case here, the State has detailed the many potential harms  
8 attendant to unrestricted disclosures, the Arizona Court of Appeals has noted that the  
9 appropriate response from a trial court is "an order restricting access to the copies to  
10 [Defendant], his attorney and his attorneys' agents for defense preparation, having the  
11 State rather than the defense make the copies, precluding further copying and requiring  
12 the copies be returned to the State at the conclusion of the trial or appeal ...[.]"  
13 *Cervantes*, 206 Ariz. at 183-84, 76 P.3d at 454-55. The State's form of order  
14 accomplishes these appropriate restrictions.

15 2. The Protective Order is less restrictive than redacting or withholding  
16 information.

17 In this case, the State must obtain and review voluminous sensitive information,  
18 including, but not limited to, the electronic information on the multitude of devices and  
19 DVR recording devices located in Defendant's home, medical records of the victim, the  
20 forensic interview of the victim, and body cam footage from a variety of officers  
21 involved in investigating the crimes alleged against Defendant. The proposed Protective  
22 Order, which expedites a Defendant's access to information that may be used in his  
23 defense while also protecting the interests of victim and the State's on-going  
24 investigation, thus strikes the appropriate balance of competing interests "allowing both  
25 parties restricted use of the information while maintaining the victim's right 'to be treated  
with fairness, respect, and dignity, and to be free from intimidation, harassment, or abuse,

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1 throughout the criminal justice process.’ Ariz. Const. art. II, § 2.1(A)(1).” *State ex rel.*  
2 *Montgomery*, 234 Ariz. at 258, 321 P.3d at 423.

3 The State’s Protective Order is also the least restrictive means of moving pre-trial  
4 discovery forward, as it allows the State to provide information to Defense counsel  
5 without redactions under protection of the Protective Order, with the understanding that  
6 the parties will re-visit the items in advance of trial to address any potential  
7 disagreements over removing or altering the “confidential” designation to allow for use at  
8 trial.

9 For example, forensic interviews, forensic images of electronic device hard drives,  
10 or body cam footage may be provided to counsel for the defense pursuant to the State’s  
11 Protective Order to protect the victims, witnesses, or even the Defendant. It may be that  
12 the parties ultimately redact certain portions from the videos before trial, but having the  
13 Protective Order in place allows the State to provide the information without first  
14 completing the heavy administrative burden of pouring over hours of audio and video to  
15 complete redactions.

16 Instead, the State has a court order requiring Defendant, Defendant’s counsel, and  
17 any others who “agree to be bound” before gaining access to the information that the  
18 materials will be used narrowly for the purposes of the defense. As currently written, the  
19 Rules of Criminal and Civil Procedure do not provide those assurances to the State,  
20 which results in significant burdens and delays in discovery while the State reviews and  
21 edits voluminous amounts of potentially relevant, and thus discoverable, data that must  
22 be reviewed and redacted pursuant to the State’s competing obligations to victims,  
23 confidential informants, minors, or other sensitive witnesses.

24 ///

25 ///

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**C. The State's Form of Protective Order Does Not Erect Undue Burdens Upon Counsel or the Defendant**

**1. Defendant Does Not Establish Burden in securing Agreements to Be Bound.**

Counsel for the Defendant claims the Protective Order interferes with her ability to consult with experts or other third parties to assist her in her investigation and preparation of a defense because they would have to sign a single-page "Agreement to be Bound" by the Protective Order before reviewing "Confidential" materials.

Defendant does not explain how having an expert or other third parties sign the "Agreement to be Bound" is onerous. The single-page "Agreement to be Bound" simply ensures the third party receiving the information will abide by this Court's Protective Order, and further abide by what Defense counsel claims to be her singular purpose—use of the information exclusively to mount a defense for Defendant. Counsel for the Defendant has not demonstrated that securing signatures on an Agreement to be Bound is burdensome or impossible to accomplish. To the contrary, Cochise County Legal Defender Joel Larson has previously indicated during oral argument to this Court on another matter that his office employs a similar agreement to be bound with its own experts. The use of "agreements to be bound" are not foreign concepts to the defense bar, and has apparently been successfully applied for some time without undue burden to counsel.

Additionally, sections 2.3 and 7.2 provide that no "Agreement to be Bound" is required before the receiving counsel may provide designated materials to: (1) other attorneys or staff of Defendant's office, (2) the court and its personnel, (3) the author of the document that is the subject of the designation, and (4) any custodian or person who previously possessed or knew the information in the document.



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2. The Order Prohibits Obstructionist Conduct and Preserves the Court's Authority Regarding Discovery.

Counsel for the State has had several disappointing encounters with counsel for the Defendant related to discovery agreements. The Protective Order proposed by the State alleviates the State's concerns regarding communications issues between counsel and promote clarity as to all parties obligations.

The Protective Order requires counsel for each party to identify documents she or he deems to be "Confidential," and the attorneys are ordered by the Court to exercise "restraint" and "care" in designating materials. See Protective Order at Section 5.1. To further avoid over-broad or obstructionist use of the Protective Order, the definition of "Confidential" is restricted to sensitive, private items that are protected by the rules or statutes. See "Confidential" definition, Section 2.2 of Protective Order.

To further guard against abusive practices and address disagreements of counsel without burdening the Court, the order requires opposing counsel to raise an objection and meet and confer to resolve the dispute if he or she disagrees with a "Confidential" designation. Such objection can be made by the non-designating party "at any time." See Protective Order, Section 6.1. If the parties are unable to resolve the dispute, then the Court is consulted. *Id.* at Sections 6.2-6.3. Additionally, at any time, parties may agree to remove the confidentiality designation or apply to the Court to remove the confidentiality designations. *Id.* at, for example, Section 4 (noting that the protections of the Protective Order remain in effect "until a Designating Party agrees otherwise in writing or a court order otherwise directs"), Section 6.1 ("Any party or non-party may challenge a designation of confidentiality at any time."), Section 7.2 ("Unless otherwise ordered by the court or permitted in writing by the Designating Party...").

The Protective Order thus accomplishes the legitimate purposes acknowledged by Arizona authorities that have evaluated protective order issues pursuant to Rule 15.5,

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1 Arizona Rules of Criminal Procedure. *See McMurtrey*, 136 Ariz. at 97, 664 P.2d at 641  
2 (Upholding the trial court's order redacting witness addresses where "[a]t the hearing ...  
3 the evidence indicated that the five witnesses whose names were withheld all expressed  
4 fear at having to testify against appellant and requested that their addresses be  
5 withheld."); *Cervantes*, 206 Ariz. at 186, 76 P.3d at 457; *State ex rel. Montgomery*, 234  
6 Ariz. at 258, ¶ 21, 321 P.3d at 423 ¶ 21 ("to the extent that disclosing a victim's birth date  
7 may create a risk of harassment or other harm, we reiterate that the existing rules allow a  
8 prosecutor to seek a court order denying or limiting disclosures otherwise required by  
9 Rule 15.1.").

10 3. The Protective Order's Sealing Standards are Enforceable and The  
11 Protective Order Does Not Create Statute of Limitations Issues.

12 Defendant's claim that designation of documents as confidential creates some  
13 issue with the Statute of Limitations or that Cochise County cannot enforce its procedure  
14 for sealing documents are in error. First, the obligations of the protective order are  
15 addressed by the return of materials to the State or destruction of the materials, so parties  
16 or an "agreement to be bound" signatory may alleviate concerns by confirming that he or  
17 she no longer has the materials. Similarly, counsel's complaints about the procedure to  
18 seal documents are in error. The procedure is in compliance with Arizona rules, which  
19 Cochise County follows.

20 **D. The Protective Order Does Not Violate Due Process or the Confrontation**  
21 **Clause.**

22 Although Defendant suggests his own version of a protective order, he also argues  
23 that a protective order violates his right to due process and runs afoul of the  
24 Confrontation Clause. These arguments ignore the fundamental nature of a protective  
25 order, which governs effective administration of pre-trial discovery. Moreover, as noted

1 above, Defendant's substantive right to present a defense is improved by the Protective  
2 Order, as it allows the State to provide prompt access to information while reserving the  
3 parties' ability to address and resolve redactions, edits, and potential objections as to the  
4 relevance and admissibility of the information at trial at a later date.

5 **E. The State's Proposed Protective Order is the Least Restrictive Means of**  
6 **Advancing Disclosure Between the Parties.**

7 It appears from the proposed order submitted by counsel for Defendant that  
8 Defendant would have the parties apply to the court as to each specific document for  
9 which confidential designations or redactions may be appropriate. Defendant's approach  
10 is unworkable, and has already been rejected by at least one other Court. Counsel and the  
11 Court do not have time to apply to the Court and potentially hold hearings for each and  
12 every document that may be discoverable in this matter. As Defendant's suggested  
13 approach and proposed Protective Order would be extremely cumbersome in practice, it  
14 is not the least restrictive means of completing disclosure.


15 The State's proposed Protective Order is the least restrictive means of addressing  
16 the competing interests. It does not require piecemeal analysis. Rather, it requires  
17 counsel for the parties, as information is obtained, to review and identify whether the  
18 information is confidential—either due to statutory requirements, victim's rights, or valid  
19 safety and integrity concerns that have arisen during the course of proceedings—and  
20 identify the materials as such before disclosing them to the opposing party. Counsel, and  
21 all those who agree to maintain the information in confidence and limit use to preparing  
22 the defense, may then have access to the materials as the parties proceed through the  
23 matter to trial. As trial nears, the parties would evaluate whether certain redactions or  
24 other measures are needed for designated documents deemed necessary for trial to  
25 address confidentiality issues before seeking to publicize materials at trial. This approach  
is fair to all parties, does not burden the Court with endless "in camera" requests, and

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1 promotes prompt and complete analysis of the strengths and weaknesses of each parties'  
2 position in advance of trial. The State's proposed Protective Order should be entered.

3 RESPECTFULLY SUBMITTED this 15th day of August, 2018.

4 COCHISE COUNTY ATTORNEY

5  
6 By:   
7 SARA V. RANSOM  
8 DEPUTY COUNTY ATTORNEY

9 Original filed with the Cochise County Clerk of the Court this 15th day of August, 2018.

10 Copies of the foregoing  
11 mailed/delivered this 15th  
12 day of August, 2018, to:

13 Honorable Wallace R. Hoggatt  
14 Judge of the Superior Court, Division 3  
15 *Via Courthouse Distribution Box (courtesy copy via e-mail)*

16 Xochitl Orozco, Esq.  
17 Deputy Public Defender  
18 *Via Courthouse Distribution Box (courtesy copy via e-mail)*

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From: Ransom, Sara

Sent:

To:

Subject:

Orozco, Xochitl  
Friday, July 6, 2018 11:10 AM  
Ransom, Sara  
RE: Luis Siqueiros CR201800385

That makes sense, thank you. I had Erica follow up yesterday on the Chasse order... no news. I thought we would have heard by now.

Xochitl

**From:** Ransom, Sara  
**Sent:** Friday, July 06, 2018 11:09 AM  
**To:** Orozco, Xochitl <SOrozco@cochise.az.gov>  
**Subject:** RE: Luis Siqueiros CR201800385

I have been waiting to see what changes Judge Conlogue makes to the Chasse PO so I can use that form. I will file a motion today to get things in motion and lodge a proposed form of order once we get Judge Conlogue's form of PO

Sara

**From:** Orozco, Xochitl  
**Sent:** Friday, July 6, 2018 11:06 AM  
**To:** Ransom, Sara <SRansom@cochise.az.gov>  
**Subject:** Luis Siqueiros CR201800385

Good day Sara,  
I am following up on the email I sent June 27. Have you filed a motion for protective order in Siqueiros? The cds are something I need to look into soon.  
Thank you for your time,  
Xochitl

**From:** Orozco, Xochitl  
**Sent:** Wednesday, June 27, 2018 10:41 AM  
**To:** Ransom, Sara <SRansom@cochise.az.gov>  
**Subject:** RE: Luis Siqueiros CR201800385

Good day Sara,  
I wanted to follow up on the Siqueiros-Medina case. The disclosure states that the cds are being withheld pending ruling on the motion for protective order. I have not received a motion for protective order yet. You may have been holding on to the motion while I was gone. Let me know.  
Thank you for your time,  
Xochitl

**From:** Ransom, Sara  
**Sent:** Monday, June 11, 2018 9:32 AM  
**To:** Orozco, Xochitl <SOrozco@cochise.az.gov>  
**Subject:** RE: Luis Siqueiros CR201800385



No problem, thanks

**From:** Orozco, Xochitl  
**Sent:** Monday, June 11, 2018 8:40 AM  
**To:** Ransom, Sara <[SRansom@cochise.az.gov](mailto:SRansom@cochise.az.gov)>  
**Subject:** RE: Luis Siqueiros CR201800385

Good morning Sara,  
Sorry to hear about your hectic month, I understand completely. I am going on vacation for a week and then in the public defender conference next week. I will not be back until the 25<sup>th</sup>. If you want to file something in Siqueiros and have a hearing that is fine with me, just please don't set it before July 2 so that I have time to respond.  
Thank you for your time,  
Xochitl

**From:** Ransom, Sara  
**Sent:** Friday, June 08, 2018 5:52 PM  
**To:** Orozco, Xochitl <[SOrozco@cochise.az.gov](mailto:SOrozco@cochise.az.gov)>  
**Subject:** RE: Luis Siqueiros CR201800385

Xochitl,

I apologize—I had intended to bring up a PO with you, and I should have at least made sure the non-confidential documents went out in a supplemental disclosure. Its been a very hectic month. I will have additional documents out to you Monday. I imagine we will be fighting over the PO.

Sara

**From:** Orozco, Xochitl  
**Sent:** Tuesday, June 5, 2018 9:13 AM  
**To:** Ransom, Sara <[SRansom@cochise.az.gov](mailto:SRansom@cochise.az.gov)>  
**Subject:** Luis Siqueiros CR201800385

Good morning Sara,  
I wanted to follow up on the disclosure on Luis Siqueiros. He had his arraignment on April 30, 2018. I still have not received any media on this case including his interview with police, the forensic interviews with the alleged victims and the interview with one of the alleged victim's mother, F.C.  
Could you please follow up on this?  
Thank you for your time,  
Xochitl

**Xochitl Orozco**  
Deputy Public Defender  
Cochise County Public Defender's Office  
4 Ledge Avenue, 3rd Floor  
Administration Building  
(Mailing address: P.O. Box 1856)  
Bisbee, AZ 85603  
520-432-8440 or 800-953-9263  
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